Application No: 10/718,524
Attorney's Docket No: ALC 3098

REMARKS/ARGUMENTS

Applicant acknowledges receipt of the Office Action dated 7/18/2006. Claims 1-21 and 23-26 are pending in the application and are presented for reconsideration and further examination in view of the following remarks and arguments.

By this Response and Amendment claims 1, 2, 15, 16, 21, 23 and 24 have been amended; claim 22 has been canceled; and the rejections of claims 1-26 are respectfully traversed.

Claims 1, 2, 15, 16 and 24 have been amended to correct typographical errors; independent claim 21 has been amended to incorporate subject matter previously recited in dependent claim 22; and claim 23 has been amended to change its dependency from claim 22 (now canceled) to claim 21.

Claim Objections

Claim 1 was objected to because of an informality due to a typographical error. Claim 1 has been amended to correct the typographical error, thereby obviating the objection. Accordingly, reconsideration and withdrawal of the objection to claim 1 is respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-6, 10-20 and 24-25 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Davis (Patent Application Pub. No. US 2004/0085953), hereinafter noted "Davis." Claims 21-23 were rejected under 35 U.S.C. § 102(b) as allegedly anticipated by Yu et al.

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("Forwarding Engine for Fast Routing Lookups and Updates," in Globecom'99 IEEE Conf. Proceedings), hereinafter noted "Yu." Applicant respectfully traverses the rejections.

The test for anticipation under section 102 is whether each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP §2131. The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989); MPEP §2131. The elements must also be arranged as required by the claim. *In re Bond*, 15 USPQ2d 1566 (Fed. Cir. 1990).

Independent claim 1 recites "selecting a window size of n window bits and an offset of o offset bits." Applicant respectfully submits that Davis does not disclose, teach or suggest this subject matter.

Rather, Davis discloses a method in which the N most significant bits of the IP address are used as an index to a length table. *See* Fig. 2 and § 0017. That is, the N left-most bits of the IP address are always selected, whereas as recited in claim 1 of the application, the bits selected are the ones found within a window that is n bits long and is offset by o bits with respect to the left-most bit. In other words, unlike the disclosure of Davis, the bits selected by the method recited in claim 1 are not the most significant bits of the IP address.

Furthermore, Applicant respectfully submits that the Office Action misconstrues the fill bits mentioned in Davis. They have nothing in common with the offset recited in claim 1.

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Davis discloses a method involving fixed-length keys. As disclosed in Fig. 2 of Davis, the keys are constructed using prefix bits (82), and fill bits (86) that are appended to the prefix bits. The number of fill bits is variable and adapted in order to obtain keys that are always the same length. For instance, Fig. 2 discloses three keys (70, 74 and 78) having three different numbers of prefix bits and, consequently, three different numbers of fill bits. For a better understanding of the difference between the offset recited in claim 1 and the fill bits disclosed by Davis, compare Figure 2 of the application with Fig. 2 of Davis. The fill bits disclosed therein by Davis do not anticipate the offset bits recited in claim 1.

Regarding independent claim 24, the claim recites "a search area for storing a prefix length search tree constructed using said grouping table." Applicant respectfully submits that Davis does not disclose, teach or suggest this subject matter.

Davis discloses a length table "constructed based on a prefix tree and a predetermined index size." *See* § 0028, 0029 and 0039; and Fig. 3A. The prefix tree disclosed in Davis is not constructed using a grouping table as recited in claim 24. Instead the prefix tree disclosed in Davis is built "to represent all of the prefixes available or known to the network device." *See* § 0028.

Applicant therefore submits that the Office Action has failed to establish a *prima facie* case of anticipation because Davis does not disclose each an every element recited in independent claims 1 and 24. Accordingly, reconsideration and withdrawal of the rejection of claims 1 and 24 is respectfully requested.

Claims 2-6 and 10-20 depend from claim 1, and are therefore also patentable over Davis for at least the reasons stated above in connection with claim 1, as well as for the separately patentable subject matter recited therein. Accordingly, reconsideration and withdrawal of the rejection of claims 2-6 and 10-20 is also respectfully requested.

Claim 25 depends from claim 24 and is therefore also patentable over Davis for at least the reasons stated above in connection with claim 24, as well as for the separately patentable subject matter recited therein. Accordingly, reconsideration and withdrawal of the rejection of claim 25 is also respectfully requested.

Regarding now claim 21, the claim recites "selecting a window of n bits from an IP address of said PDU and arranging said selected group in the form of a grouping table with all prefix lengths available for said n bits." Applicant respectfully submits that Yu does not disclose, teach or suggest this subject matter.

Yu discloses a hardware configuration wherein route prefixes are statically allocated to four memory modules according to the number of bits in said prefixes. For instance, module #1 contains prefixes that are 8, 12, 16 and 20 bits long, and 24-bit prefixes with bits 7 and 8 equal to 00. *See* Table 1. However, Yu does not disclose, teach or suggest selecting a window of n bits from the IP address, and arranging a selected group in a grouping table with **all prefix lengths available for said n bits,** as recited in claim 21.

Applicant therefore submits that claim 21 is not anticipated by Yu. Accordingly, reconsideration and withdrawal of the rejection of claim 21 is respectfully requested.

Claim 23 depends from claim 21 and is therefore also patentable over Yu for at least the reasons stated above in connection with claim 21, as well as for the separately patentable subject matter recited therein. Accordingly, reconsideration and withdrawal of the rejection of claim 23 is also respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 7-9 and 26 were rejected under 35 U.S.C. §103(a) as allegedly obvious over Davis in view of Yu. Applicant respectfully traverses the rejections.

Claims 7-9 and 26 depend, respectively, from claims 1 and 24, and are therefore also patentable for at least the reasons stated above in connection with the rejection of claims 1 and 24, as well as for the separately patentable subject matter recited therein. Yu fails to overcome the deficiencies in Davis noted above in connection with the rejection of claims 1 and 24. Yu is further deficient as noted above in connection with the rejection under 35 U.S.C. § 102 based on Yu. Accordingly, reconsideration and withdrawal of the rejection of claims 7-9 and 26 is also respectfully requested.

CONCLUSION

While we believe that the instant amendment places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner telephone the undersigned attorney in order to expeditiously resolve any outstanding issues.
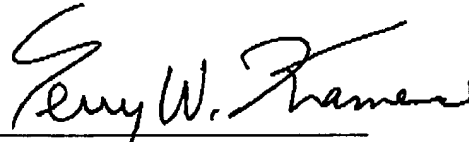
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Respectfully submitted,
KRAMER & AMADO, P.C.

Date: <u>August 25, 2006</u>

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